Erith Soil Treatment Facility

784- B066441

Non-Technical Summary

Environmental Permit Application

Hanson Quarry Products Europe Ltd

January 2025

Document prepared on behalf of Tetra Tech Environment Planning Transport Limited. Registered in England number: 03050297

TETRA TECH

Tetra Tech Manchester, 2nd Floor, 11 York Street, Manchester, United Kingdom, M2 2AW

Tetra Tech Environment Planning Transport Limited. Registered in England number: 03050297
Registered Office: 3 Sovereign Square, Sovereign Street, Leeds, United Kingdom, LS1 4ER

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1.0 Non-Technical Summary

1.1 Environmental Permit Application

1.1.1 This Environmental Permit Application has been prepared by Tetra Tech on behalf of the Operator, Hanson Quarry Products Europe Ltd (Hanson), in accordance with the requirements of the Environmental Permitting (England and Wales) Regulations 2016 as amended.

1.1.2 This application relates to Hanson's site Erith Soil Treatment Facility located at Hanson Quarry Products Ltd, Church Manorway, Erith, DA8 1DE and is centred at approximate National Grid Reference (NGR) TQ 50786 79709. The application site is detailed on Drawing Number ERI/B066441/PER/01.The site is bound to the east by the Thames Pathway and to the north, south and west by industry.

1.1.3 Hanson seek to obtain a Bespoke Environmental Permit for a Soil Washing Facility and a Treatment of Non-Hazardous Waste Facility that will process a maximum of 800,000 tonnes per annum of non-hazardous soils. The activities on site will comprise of both dry recycling and soil washing to produce quality aggregates, soils and clay products for construction projects. The dry recycling process will consist of sorting, separation, screening, crushing, and blending of waste for recovery as a soil, soil substitute or aggregate.

1.1.4 Both the soil washing and physical treatment facility will each process approximately 400,000t of wastes per annum.

1.1.5 Historically, around 300,000t of marine dredged aggregates have been landed at the site annually from boats using the River Thames; the peak was around 400,000t per annum when another wharf facility was not operational. It is proposed that imports of marine dredged aggregates would mirror the historic average. All processed aggregates were exported from the site by road.

1.1.6 The CDE waste would be imported by road for processing and exported by road. The facility has been designed to be able to process up to 800,000t of material to produce quality aggregates, soils and clay products for construction projects. Initially, it is anticipated that imports would be in the order of 300,000t to 400,000t per annum.

1.1.7 Outputs from the Soil Washing and Physical Treatment Facility will be classed as products. However, any waste from the site will be categorised as set out in WM3 in accordance with Section 5.1 of the Appropriate Measures

1.1.8 Further, the total quantity of untreated material stored on-site will be 500kt and the total quantity of treated material to be stored on-site at any one time will be 350kt.

1.1.9 This application is accompanied by all relevant documentation, as required by the aforementioned Regulations, and in the format set out in the Environment Agency (EA) guidance documents. Details of the supporting documents are provided in the following section.

1.2 Overview of Site Activities

1.2.1 All site activities will be undertaken in accordance with EA Guidance 'Non-hazardous and inert waste: appropriate measures for permitted facilities' (Appropriate Measures).

Soil Washing

1.2.2 The soil washing facility will be to create recycled aggregates, soils and clays which are suitable for use in construction projects

1.2.3 It is considered that the proposed activity will fall under the following Recovery and Disposal codes (R and D codes) shown in Table 1, provided for in Annex II to Directive 2008/98/EC of the European Parliament and The Council of 19th November 2008 Waste.

Table 1: Proposed R&D Codes for Soil Washing

R/D Code	Description of Activity
R3	Recycling/ reclamation of organic substances which are not used as solvents
R5	Recycling/reclamation of other inorganic compounds
R13	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)

Physical Treatment Facility

1.2.4 The physical treatment facility will allow for the treatment of waste consisting only of sorting, separation, screening, crushing, and blending of waste for disposal or for recovery as a soil, soil substitute or aggregate.

1.2.5 It is considered that the proposed activity will fall under the following Recovery and Disposal codes (R and D codes) shown in Table 1, provided for in Annex II to Directive 2008/98/EC of the European Parliament and The Council of 19th November 2008 Waste.

Table 2: Proposed R&D Codes for Physical Treatment

R/D Code	Activity Description
R3	Recycling/reclamation of organic substances which are not used as solvents
R5	Recycling/reclamation of other inorganic materials
R13	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
D15	Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

1.2.6 Further information regarding the activities at the site, including the waste acceptance procedures and process descriptions, are provided in the Operating Techniques, Appendix C of the Environmental Permit Variation Application.

2.0 Supporting Information

2.1 Application Forms

2.1.1 Forms A, B2, B4 and F1 have been included as part of this application. These forms are provided as Appendix A.

2.2 Pre-Application Discussions

Part B2, Question 1a

2.2.1 Pre-application discussions have been undertaken. A copy of the relevant correspondence is provided as Appendix B.

2.3 Ability as an Operator

Part B2, Question 3b

2.3.1 The site will be managed by an individual who possesses the required level of technical competence.

2.3.2 Evidence of technical competence for the site has been provided as part of the Operating Techniques document (Appendix C of the Environmental Permit Application).

2.4 Management System

Part B2, Question 3d

2.4.1 Hanson has an accredited environmental management system in place which is compliant with the requirements of ISO 14001.

2.4.2 According to the guidance notes that accompany the Part B2 application form, an indicative summary and relevant certificates are to be provided if the proposal involves a waste installation or waste operations. As such, an indicative summary of the site's environmental management system and a copy of Hanson's ISO14001 Certificate is provided as part of the Operating Techniques document (Appendix C of the Environmental Permit Application).

2.5 Site Plan

Part B2, Question 5a

2.5.1 A site layout plan (Drawing Number ERI/B066441/LAY/01) has been prepared to show the indicative layout of plant and storage areas on-site.

2.6 Site Condition Report

Part B2, Question 5f

2.6.1 A Site Condition Report has been provided as Appendix G of the Environmental Permit Application to detail the proposed activity.

2.7 Environmental Risk Assessment

Part B2, Question 6

2.7.1 An Environmental Risk Assessment (Appendix D) has been prepared to consider the potential impact of the proposed activity. The Environmental Risk Assessment (ERA) is concerned with the nature and extent of any linkages between the source of any environmental hazards and the receptors which may be susceptible to harm; such linkages being termed pathways. Where potential for harm is identified, the assessment identifies the management techniques which will be utilised to mitigate such impacts.

2.8 Operating Techniques

Part B4, Question 3a

2.8.1 An Operating Techniques document has been prepared that describes how the site is operated and demonstrates compliance with the Environment Agency's Appropriate Measures Guidance. This document includes the list of waste codes to be accepted at the site.

2.8.2 A copy of the Operating Techniques is provided as Appendix C of the Environmental Permit Application.

2.9 General Requirements

Part B4, Table 2

2.9.1 According to the EA's 'Control and monitor emissions for your environmental permit' guidance dust management plan is required if a site is *"keeping or treating (or both) aggregates, soils, ashes or similar materials"*. As such, a Dust Management Plan (Appendix E of the Environmental Permit Application) has been prepared to describe the measures that will be in place to prevent occurrence of dust from the proposed activities.

2.9.2 As noted in Section 1.1.4, Hanson are seeking an environmental permit to operate a soil washing plant. As such there is no intention to accept any waste streams that are putrescible in nature and therefore the risk of odour is expected to be low. In addition, the aforementioned guidance does not indicate that an Odour Management Plan (OMP) is required for the activities that are proposed under this application. As such, an OMP has not been provided to support this application.

2.9.3 Nevertheless, the Environmental Risk Assessment (Appendix D of the Environmental Permit Application) and the Operating Techniques Document (Appendix C of the Environmental Permit Application) has been prepared to address how the risk of odour from the proposed changes will be minimised.

2.9.4 A Noise Management Plan (NMP) has been prepared to describe the measures that will be in place to minimise the risk of noise from the proposed activities. A copy of the NMP is provided as Appendix F of the Environmental Permit application.

2.10 Application Fees

Part F1, Question 1

2.10.1 It is considered that the application fee will comprise the following: -

Table 3: Application Fees

Activity Reference	Description	Application Type	Fee
1.16.14	Physical and chemical treatment of waste	Permit Application	£7,930
1.16.12	Physical treatment of non-hazardous waste	Permit Application with 50% discount	£3,965
1.19.5	Emissions Management Plan	-	£1,241
1.19.7	Noise and Vibration Management Plan	-	£1,246
		Total	**£14,382**

2.10.2 Due to more than one application activity being the subject of an application for a permit, and the activities being associated with each other, the fee for the Physical Treatment for Non-hazardous Waste activity has been reduced by 50%.

Drawings

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Appendix A - Application Forms

Appendix B – Pre-application Discussions

Appendix C – Operating Techniques

Appendix D – Environmental Risk Assessment

Appendix E – Dust Management Plan

Appendix F – Noise Management Plan

Appendix G – Site Condition Report